

Scott W. Gross
MI Bar No. P43094
P.O. Box 380257
Clinton Twp., MI 48038
586-416-8000

IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO DIVISION

UNITED STATES OF AMERICA,

v.

WILLIAM BAILEY,

Defendant.

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Case No. 13-CR-3046-CAB

MOTION FOR ADMISSION PRO HAC VICE

Comes now Scott W. Gross, pursuant to Local Rule 83.3(c) for this district, and hereby moves this Honorable Court for an order granting him permission to appear in this cause as defense counsel for the Defendant, William Bailey. As grounds therefore, stating as follows:

1. That he is an attorney licensed to practice law in Michigan, has been admitted to practice before the courts of Michigan since 1989, is currently a member in good standing of the bar of that State and maintains his office at the address noted. I have not concurrently nor within the year preceding this application made any pro hac vice application to this Court. Further, counsel has been admitted to practice before the United States District Court, Western District of Michigan (January 25, 1999) and Eastern District of Michigan (October 5, 1993); the

United States Courts of Appeals for the Fourth Circuit (August 7, 2006); and United States Tax Court (November 27, 2000). He has also been admitted to practice pro hac vice before the U.S. District Courts for the Eastern District of Pennsylvania, the District of Montana and the District of South Carolina.

2. I designate David Michael, Law Offices of David Michael, One Sansome Street, Suite 3500, San Francisco, CA 94104, (415) 946-8996, as associate local counsel.

Wherefore, counsel asks that the Court enter an order permitting him to appear pro hac vice in the above matter.

Respectfully submitted this the 9th day of December, 2014.

/s/ David Michael

David Michael

/s/ Scott W. Gross

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DECLARATION OF SCOTT W. GROSS

State of Michigan)
County of Macomb)

I, Scott W. Gross, declare under the penalties of perjury as follows:

I am an attorney licensed to practice law in Michigan, having been admitted in November, 1989. I have practiced law across the State of Michigan since my admission and my current office address appears below. I have also been admitted to practice before the following courts:

- (a). Michigan Courts: admitted November 16, 1989 (Bar No. P43094);
- (b). United States District Court, E.D. Michigan: admitted October 5, 1993;
- (c). United States District Court, W.D. Michigan: admitted January 25, 1999;
- (d). United States Tax Court: admitted November 27, 2000;
- (e). United States Court of Appeals for the Fourth Circuit: admitted August 7, 2006;
- (f). United States District Court, E.D. Pennsylvania: admitted pro hac vice July, 2007;
- (g). United States District Court, District of South Carolina: admitted pro hac vice December 2004;
- (h) United States District Court, District of Montana, February 2008;

I am a member in good standing of all the courts noted above and eligible to practice in each of them. No disciplinary or grievance proceedings are pending against me in any jurisdiction, and I am not suspended or disbarred from practice in any court.

I do solemnly swear that I will support the Constitution of the United States and that I will demean myself uprightly and according to law and the recognized standards of ethics of

the legal profession. I do further solemnly swear that I have read the Federal Rules of Civil Procedure, 28 U.S.C.; the Federal Rules of Criminal Procedure, 18 U.S.C; the Federal Rules of Evidence, 28 U.S.C.; and that I am fully prepared to use and abide by them in my practice before this Court.

I, Scott W. Gross declare under penalty of perjury, pursuant to 28 U.S.C. §1746, that the foregoing facts are true and correct to the best of my knowledge.

Executed on this the 9th day of December, 2014.

/s/ Scott W. Gross
Scott W. Gross (P43094)
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CERTIFICATE OF SERVICE

I hereby certify that, on December 9, 2014, a copy of the Motion For Admission and Statement was served on the following persons by the following means:

- (X) CM/ECF
- () Hand Delivery
- () U.S. Mail
- () Overnight Delivery Service
- () Fax
- () E-Mail

Joseph J.M. Orabana
880 Front Street, Room 6293
San Diego, CA 92101

Dated this the 9th day of December, 2014.

/s/ Scott W. Gross
Scott W. Gross